

Philip J. Berg, Esquire  
Pennsylvania I.D. 9867  
**LAW OFFICES OF PHILIP J. BERG**  
555 Andorra Glen Court, Suite 12  
Lafayette Hill, PA 19444-2531  
Telephone: (610) 825-3134  
E-mail: [philjberg@gmail.com](mailto:philjberg@gmail.com)

*Attorney for Plaintiffs*

**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA,  
SOUTHERN DIVISION**

LISA LIBERI, et al,

Plaintiffs,

vs.

ORLY TAITZ, et al,

Defendants.

CIVIL ACTION NUMBER:  
**8:11-cv-00485-AG (AJW)**

**PLAINTIFFS RESPONSE IN  
OPPOSITION TO DEFENDANT,  
YOSEF TAITZ, IN HIS  
INDIVIDUAL CAPACITY,  
MOTION TO STRIKE**

Date of Hearing: August 29, 2011  
Time of Hearing: 10:00 a.m.  
Location: Courtroom 10D

**COMES NOW** Plaintiffs, Philip J. Berg, Esquire [hereinafter at times  
“Berg”]; Lisa Ostella [hereinafter at times “Ostella”]; Lisa Liberi [hereinafter at  
times “Liberi”]; Go Excel Global and Law Offices of Philip J. Berg by and through  
their undersigned counsel, Philip J. Berg, Esquire and files the within Response in  
Opposition: Memorandum of Points and Authorities; Declaration of Philip J. Berg,  
Esquire in Opposition to Defendant, Yosef Taitz [“Taitz”], in his Individual

1 Capacity, Motion to Strike portions of Plaintiffs First Amended Complaint  
2 ["FAC"]. Plaintiffs aver the following:  
3

4       1. Defendant Yosef Taitz's Motion to Strike seeks to Strike portions of  
5 Plaintiffs Prayer for Relief that does **not** pertain to Yosef Taitz. In particular,  
6 Paragraph four (4) on page 165-166 of Plaintiffs First Amended Complaint  
7 ["FAC"]. This is improper as Defendant Yosef Taitz is **not** even named in  
8 Paragraph 4 of Plaintiffs Prayer for Relief, Plaintiffs FAC, pages 165-166, nor does  
9 it pertain to Defendant Yosef Taitz.  
10  
11

12       2. Defendant Yosef Taitz is seeking to strike Plaintiffs prayer for relief  
13 as to all Defendants, which is **not** proper and should **not** be allowed.  
14  
15

16       3. Plaintiffs do have a couple of typographical errors in their pleadings,  
17 which are pointed out in Plaintiffs Memorandum of Points and Authorities filed  
18 concurrently herewith. If the Court requires, Plaintiffs will be happy to file an  
19 Errata to correct said errors.  
20

21       4. Defendant Yosef Taitz's Motion to Strike is premature and only  
22 brought to delay the proceedings.  
23

24       5. Plaintiffs Opposition is based on this Response in Opposition;  
25 Plaintiffs Memorandum of Points and Authorities; Declaration of Philip J. Berg,  
26 Esquire; the records on file with this Court; and such other argument and evidence  
27 which may be presented at the time of Hearing.  
28

